



**MCI Telecommunications
Corporation**

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

August 27, 1998

Kathryn C. Brown
Chief
Common Carrier Bureau
Federal Communications Commission
Room 500
1919 M Street, NW
Washington, DC

RE: CC Docket No. 92-237

Dear Ms. Brown:

MCI seeks to rebut recent statements by AT&T and certain LECs in their comments on MCI's Petition for Emergency Stay for CIC transition by September 1, 1998. These parties insinuate that MCI's efforts to educate consumers were deficient. This is false. MCI has sought to protect one of the most successful telecommunications products introduced this decade: Telecom USA's 10-10-321. The unsupported allegations made by AT&T and by the LECs would distract from the real issue raised in MCI's Petition: dial around service integrity has suffered because of the LECs indifference in administering a critical network change.

It is critical that the FCC understands that MCI and other dial around providers have spent tens of millions of dollars to educate the public in the dialing pattern change for these services. MCI's efforts began in November 1997 and continue today. Specifically our education includes TV commercials, print ads and direct mail in five different languages. TV Commercial spots started in December 1997 and gradually increased as the year progressed. In addition to English TV Commercials, MCI advertised in Spanish, Cantonese, Japanese, Korean, and Vietnamese on such ethnic TV programming. In November 1997, MCI mailed approximately thirteen million pieces of direct mail to kick-off our 10-10-321 direct mail campaign. MCI continues to issue 3 to 6 million pieces of multi-lingual direct mail each month and will continue this effort into the near future.

In addition to taking such a leadership role in consumer education for CIC expansion, MCI asked all the LECs to include a printed message on the monthly telephone bill to their customer base explaining the change in dialing for dial around services, and also providing instructions for dialing the new Carrier Access Code. When many LECs refused, MCI then asked them to print such a message for only pre-subscribed MCI Long

cc'd to file re'd
10/1/98

Kathryn C. Brown

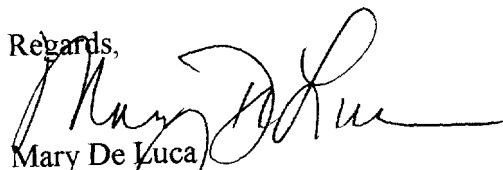
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Distance customers. Again some LECs refused, claiming, as in the case of USWest, that the dial around product competes with their intraLATA toll monopoly. Thus, they refused to assist the IXC's in educating the public on the dialing pattern change. MCI did succeed in getting many LECs to eventually print such a message- and MCI paid for each message on millions of bills.

MCI supports the FCC's intent to make the transition from three to four digit CICs a smooth one. MCI has done more than any other carrier to educate the public on the effect of CIC expansion on dialing patterns. We've taken every effort to support this plan and avoid customer confusion. The Commission should not be distracted by baseless allegations. Nor should it reward the LECs' inadequate efforts and allow them to thwart the wishes of consumers.

Regards,



Mary De Luca
Senior Policy Advisor
Federal Regulatory Affairs

Cc:

Larry Strickling
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CERTIFICATE OF SERVICE

I, Sylvia Chukwuocha, do hereby certify that on this 27th day of August, 1998, that I have served a copy of the foregoing document via messenger*, and US Mail, postage pre-paid to the following:

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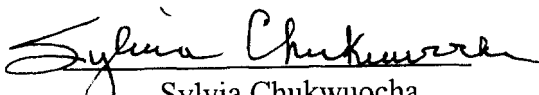
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